

LAW DEPARTMENT



*United
States
Steel
Corporation*

600 GRANT STREET
PITTSBURGH, PENNSYLVANIA 15
CABLE: USSCOLAW PGHPA

US EPA RECORDS CENTER REGION 5



403823

September 6, 1983

James J. Dragna, Esq.
Environmental Enforcement Section
Land and Natural Resources Division
U. S. Department of Justice
Washington, D. C. 20530

Re: Midco Disposal Sites, Gary, Indiana

Dear Mr. Dragna:

On August 4, 1983, in response to a request from Region V of the United States Environmental Protection Agency, U. S. Steel furnished copies of documents concerning its dealings with Midwest Industrial Waste Disposal Co. Those documents indicated shipments during 1977 of a total of 239 drums of paint overspray material. As was noted, our search for documents centered on one plant which was permanently closed in early 1980.

Your recent letter, dated September 2, 1983, to companies allegedly involved at the Midco sites included a listing of the companies according to alleged contribution to the sites. U. S. Steel has been ranked relatively high in terms of volumetric contribution. Such a ranking does not seem to comport with the documented shipments of 239 drums. The information contained in your September 2 letter indicates that the volume of wastes sent to the site in total was substantially in excess of ten-thousand drum equivalents. Thus, my impression is that you have assigned a contribution to U. S. Steel greater than the 239 drums for which documents were submitted.

In my letter of August 4, 1983, furnishing the above referenced documents, I requested that U. S. Steel be furnished with copies of all documents the government possesses concerning any dealing by U. S. Steel with the "Midco Group" companies, the Midco sites, or the operators of the sites. I hereby renew that request. In responding to the initial request from U. S. EPA, U. S. Steel made all reasonable efforts to locate documents responsive to that request. For whatever reason, including, but not limited to the plant closure, it is possible that there were other shipments for which U. S. Steel presently is unable to locate

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any documents. So that it can fully evaluate its position in this matter, it is imperative that U. S. Steel be able to review all documents in the government's possession pertaining to U. S. Steel.

Please send the documents to my attention. If you have any questions, please call me at (412)433-2923.

Sincerely yours,

Stephan K. Todd
General Attorney
Environmental

SKT/jrh

bcc: Brian A. Burke
J. David Moniot
Glenn E. Nelson